

# EXHIBIT I

**Ghazarian, Colette A**

---

**From:** Maxwell Pritt <mpritt@BSFLLP.com>  
**Sent:** Monday, October 21, 2024 1:46 PM  
**To:** Morton, Phillip; Stameshkin, Liz; David Simons; Lauter, Judd; Dunning, Angela L.; Hartnett, Kathleen; mlemley@lex-lumina.com; Ghajar, Bobby A.; Ghazarian, Colette A  
**Cc:** Jesse Panuccio; Poppell, Cole A; Biksa, Liene; Weinstein, Mark; Alvarez, Jessica; Holden Benon; Christopher Young; Aaron Cera; Cadio Zirpoli; Joe Saveri; Margaux Poueymirou; Ashleigh Jensen; Rya Fishman; Matthew Butterick; Nada Djordjevic; James Ulwick; Bryan L. Clobes; Mohammed Rathur; Amy Keller; David Straite; Ruby Ponce; Alexander Sweatman; Heaven Haile; Llama BSF; Josh Schiller; David Boies; z/Meta-Kadrey  
**Subject:** RE: Kadrey v. Meta - Depositions

**[External]**

---

Hi Phil,

In response to your other email, we tentatively can confirm Chaya Nayak on 10/31 (SF), though that date is difficult so we would appreciate if you can let us know additional availability the following week.

We are still waiting to confirm Mr. Scialom for 12/5 until we hear back from you about the other UK/EU witnesses, and waiting to confirm Yann LeCun until we hear back about the alternate dates we requested.

Separately, Meta appears to have produced relatively few documents (little to no emails, mostly academic papers) from Ms. Pineau even though we understand was one of the initial custodians selected by Meta. Can you please confirm that Meta searched Ms. Pineau's custodial files (including all email and messaging accounts) for all potentially relevant and responsive information?

Thank you.

Best,  
Max

---

**From:** Maxwell Pritt <mpritt@BSFLLP.com>  
**Sent:** Monday, October 21, 2024 9:05 AM  
**To:** Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>  
**Cc:** Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>;

Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama\_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

**Subject:** RE: Kadrey v. Meta - Depositions

Thanks, Phil.

We get back to you re Mr. Scialom, but will you be proposing the other London/EU depositions around that same time to consolidate?

Can confirm re: Messrs. Kerr (11/26), Nho (12/6), and Rao (12/13).

For Mr. LeCunn, 11/22 does not work currently—could we make 11/21, 11/24, or even 11/23 work?

Best,  
Max

---

**From:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>

**Sent:** Monday, October 21, 2024 8:58 AM

**To:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

**CAUTION:** External email. Please do not respond to or click on links/attachments unless you recognize the sender.

---

Counsel-

We can additionally offer Thomas Scialom on Thursday, December 5<sup>th</sup> (London). Please confirm this and the other four offered last night in the email immediately below.

Thanks,  
Phil

**From:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>

**Sent:** Sunday, October 20, 2024 11:11 PM

**To:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; mlemley@lex-lumina.com; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

Counsel-

We can additionally offer Yann LeCunn on Friday, November 22<sup>nd</sup> (New York), Logan Kerr on Tuesday, November 26<sup>th</sup> (Bay Area), Eugene Nho on Friday, December 6<sup>th</sup> (Bay Area), and Arun Rao on Friday, December 13<sup>th</sup> (Bay Area). Please confirm.

Thanks,  
Phil

---

**From:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>

**Sent:** Sunday, October 20, 2024 2:00 PM

**To:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; mlemley@lex-lumina.com; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

[External]

Thank you, Phil. Confirmed as to Ms. Pineau and Mr. Edunov on 11/6.

Best,  
Max

---

**From:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>

**Sent:** Sunday, October 20, 2024 5:59 AM

**To:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JSchiller@BSFLLP.com](mailto:JSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

**CAUTION:** External email. Please do not respond to or click on links/attachments unless you recognize the sender.

---

Max-

Thanks. We will circle back on these.

As an update, we are offering Joelle Pineau on Wednesday, November 6<sup>th</sup> (Montreal) and Sergey Edunov on Wednesday, November 6<sup>th</sup> (Bay Area). Please confirm.

Thanks,  
Phil

---

**From:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>

**Sent:** Sunday, October 20, 2024 1:55 AM

**To:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>;

Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** Re: Kadrey v. Meta - Depositions

**[External]**

---

Phil,

In addition to the requested information below, please also provide dates between 11/11 and 12/14 for Susan Zhang, Thomas Scialom, and Sy Choudhury. We'd be providing these names in light of your assertion that you will not be representing Guillaume Lample, Edouard Grave, or Aurelien Rodriguez. We still intend to seek discovery from them but recognize the complications of doing so in the discovery period based on our understanding that they reside and work abroad. Thank you.

Best,  
Max

---

**From:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>

**Sent:** Friday, October 18, 2024 8:05 PM

**To:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; mlemley@lex-lumina.com <[mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** Re: Kadrey v. Meta - Depositions

Thank you, Phil.

Aurelian Rodriguez is on Meta's amended initial disclosures and says contact through Cooley--please advise. If that is in fact no longer the case, please let us know when that changed and his last known contact information. Please also let us know the other former employees' last known contact information.

Best,  
Max

---

**From:** Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>

**Sent:** Friday, October 18, 2024 5:56 PM

**To:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com) <[mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

**CAUTION:** External email. Please do not respond to or click on links/attachments unless you recognize the sender.

---

Counsel,

Thank you for sending the list of witnesses. We are assessing and actively working to identify dates of availability. We will circle back soon.

Regarding Guillaume Lample, Edouard Grave, Aurelien Rodriguez, and Steven Roller, we do not currently represent these former employees and are therefore not authorized to accept service for these individuals.

Please let us know how you intend to proceed. If you intend to forego these depositions and take others in their place, we would need to know that immediately and reserve all rights.



Thanks,  
Phil

---

**From:** Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>

**Sent:** Thursday, October 17, 2024 4:54 PM

**To:** Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>  
**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>  
**Subject:** RE: Kadrey v. Meta - Depositions

[External]

---

Counsel,

We presently intend to notice depositions of the following individuals. Please let us know the following witnesses' availability between 10/24 and 11/8, and confirm their locations: Angela Fan, Mike Clark, Joelle Pineau, Chaya Nayak, and Sergey Edunov. Please let us know the following witnesses' availability between 11/11 and 11/27, and confirm their locations: Guillaume Lample, Edouard Grave, Nikolay Bashlykov, Alex Boesenberg, Yann LeCunn, Amanda Kallet, Aurelien Rodriguez, and Hugo Touvron. We understand some of these individuals are former Meta employees so please let us now if you will be representing those individuals. Finally, please let us know the following witnesses' availability between 12/2 and 12/13: Logan Kerr, Chris Cox, Eugene Nho, Steven Roller, Sean Bell, Amrish Acharya, and Arun Rao. If any individuals are not available in the requested date ranges, please let us know their subsequent availability (or for those in the later date range, all of their availability before 12/13).

Also, we have asked repeatedly that Meta identify PMKs for our topics, including again on yesterday's M&C—please do so and provide their availability, or let us know by when you will provide that information, so that we can include it in the Tuesday report to Judge Hixson.

Thank you.

Best,  
Max

---

**From:** Maxwell Pritt

**Sent:** Tuesday, October 15, 2024 4:31 PM



**To:** Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; David Simons <[DSimons@BSFLLP.com](mailto:DSimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>  
**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** RE: Kadrey v. Meta - Depositions

Thank you, Liz. We will endeavor to do so tomorrow. Please let us know tomorrow as well who you will be designating for each of the 30(b)(6) topics in the amended notice we served a week ago.

Best,  
Max

---

**From:** Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>

**Sent:** Tuesday, October 15, 2024 4:06 PM

**To:** David Simons <[dsimons@BSFLLP.com](mailto:dsimons@BSFLLP.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Kathleen Hartnett <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Jesse Panuccio <[jpanuccio@BSFLLP.com](mailto:jpanuccio@BSFLLP.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Joe Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Llama BSF <[Llama\\_BSF@bsfllp.com](mailto:Llama_BSF@bsfllp.com)>; Josh Schiller <[JiSchiller@BSFLLP.com](mailto:JiSchiller@BSFLLP.com)>; David Boies <[DBoies@BSFLLP.com](mailto:DBoies@BSFLLP.com)>; Maxwell Pritt <[mpritt@BSFLLP.com](mailto:mpritt@BSFLLP.com)>; z/Meta-Kadrey <[zmetakadrey@cooley.com](mailto:zmetakadrey@cooley.com)>

**Subject:** Kadrey v. Meta - Depositions

**CAUTION:** External email. Please do not respond to or click on links/attachments unless you recognize the sender.

---

Counsel,

In view of the Court's order today, please provide us with the list of witnesses whose depositions Plaintiffs intend to take. We need these right away to investigate their availability and comply with Judge Hixson's instructions. We ask to receive this list by tomorrow.

In addition, please provide dates and locations for the depositions of Matthew Klam and Rachel Snyder. We reserve all rights with respect to Christopher Farnsworth pending the outcome of the consolidation decision.

Best,

Liz

**Elizabeth L. Stameshkin**

Cooley LLP  
3175 Hanover Street  
Palo Alto, CA 94304-1130  
+1 650 843 5121 office  
+1 650 849 7400 fax  
+1 626 644 7586 mobile  
[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)  
Pronouns: she, her, hers

Cooley is committed to [racial justice](#)

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]